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Co-Counsel for the Debtors and Debtors-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

MERCON B.V.,

Debtor.

Chapter 11

Case No. 23-11947 (MEW)

**NOTICE OF HEARING REGARDING COMBINED SIXTH MONTHLY FEE
STATEMENT AND FINAL APPLICATION OF CHIPMAN BROWN CICERO & COLE,
LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED AS CO-COUNSEL TO THE DEBTORS AND DEBTORS IN
POSSESSION FOR THE (I) MONTHLY PERIOD FROM JUNE 1, 2024 THROUGH
AND INCLUDING JULY 31, 2024; AND FOR THE (II) FINAL PERIOD FROM
DECEMBER 13, 2023 THROUGH AND INCLUDING JULY 31, 2024**

PLEASE TAKE NOTICE that on August 30, 2024, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Combined Sixth Monthly Fee Statement and Final Application of Chipman Brown Cicero & Cole, LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Co-Counsel to the Debtors and Debtors in Possession for the (I) Monthly Period from June 1, 2024 Through and Including July 31, 2024; and for the (II) Final Period from December 13, 2023 Through and Including July 31, 2024* (the “**Application**”).

PLEASE TAKE FURTHER NOTICE that a hearing regarding the Application will be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, Courtroom 617, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”) at a hearing scheduled for **October 9, 2024, at 11:00 a.m. (Eastern Time)** (the “**Hearing**”), or at such other time as the Bankruptcy Court may determine.

PLEASE TAKE FURTHER NOTICE that the deadline to respond or object to the relief requested in the Application is **October 2, 2024, at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that any responses or objections (“**Objections**”) to the Application must:

- (a) be in writing;
- (b) specify the name of the objecting party and state with specificity the basis of the Objection(s) and the specific grounds therefor;
- (c) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York;
- (d) be filed with the Court on the docket of *In re Mercon B.V.*, Case No. 23-11947 (MEW); and
- (e) be served upon (a) the Chambers of the Honorable Michael E. Wiles, United States Bankruptcy Judge, Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408; (b) counsel to the Debtors, Baker & McKenzie LLP, 452 Fifth Avenue, New York, New York 10018, Attn: Blaire Cahn, Esquire (blaire.cahn@bakermckenzie.com) and 1111 Brickell Avenue, 10th Floor, Miami, Florida 33130, Attn: Paul J. Keenan, Jr., Esquire, John R. Dodd, Esquire and Reginald Sainvil, Esquire (paul.keenan@bakermckenzie.com; john.dodd@bakermckenzie.com; and reginald.sainvil@bakermckenzie.com); (c) co-counsel to the Debtors, Chipman Brown Cicero & Cole, LLP, 501 Fifth Avenue, 15th Floor, New York, New York 10017, Attn: Adam D. Cole, Esquire (cole@chipmanbrown.com) and 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801, Attn: Robert A. Weber, Esquire (weber@chipmanbrown.com); (d) counsel to the Official Committee of Unsecured Creditors, O’Melveny & Myers LLP, 2801 North Harwood Street, Suite 1600, Dallas, Texas 75201, Attn: Gregory M. Wilkes, Esquire and Scott P. Drake, Esquire (gwilkes@omm.com and sdrake@omm.com); (e) Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, New York 10004-1408, Attn: Daniel Rudewicz, Esquire (Daniel.rudewicz@usdoj.gov), so as to be received no later than the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Application, the Court may enter an order with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing.

Dated: August 30, 2024
New York, New York

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Robert A. Weber

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